



U.S. Department of Justice

*United States Attorney
Eastern District of New York*

JGH
F.#2020R0001

*271 Cadman Plaza East
Brooklyn, New York 11201*

May 18, 2021

By Email and ECF

The Honorable William F. Kuntz, III
United States District Judge
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

Re: United States v. Joseph Miner
Criminal Docket No. 20-554 (WFK)

Dear Judge Kuntz:

The government respectfully requests that the Court enter the enclosed Stipulation and Protective Order pertaining to certain discovery material in the above-referenced case. The government has conferred with defense counsel and the parties have stipulated and agreed to the terms of the proposed Order.

Respectfully submitted,

MARK J. LESKO
Acting United States Attorney

By: /s/Josh Hafetz
Josh Hafetz
Assistant U.S. Attorney
(718) 254-6290

Enclosure

cc: Clerk of the Court (WFK) (by ECF)
Benjamin Silverman, counsel for defendant

DMP:JGH
F.#2020R00001

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK
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UNITED STATES OF AMERICA

-against-

JOSEPH MINER,

STIPULATION & PROTECTIVE ORDER

20-CR-554 (WFK)

Defendant.

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WHEREAS, in anticipation of the sentencing of defendant JOSEPH MINER in the above-captioned case, the government intends to produce to the defense counsel certain audio-recorded conversations between the defendant and another individual, which the government deems to be “Sensitive Discovery Material,”

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned attorneys and ORDERED by the Court, that:

1. The material identified and labeled by the government as “Sensitive Discovery Material” may not be disclosed or disseminated to anyone other than (1) defense counsel, (2) defense counsel’s staff assisting defense counsel in the above-captioned case and (3) to the defendant JOSEPH MINER in the presence of defense counsel or defense counsel’s staff;

2. The defendant JOSEPH MINER, defense counsel and staff assisting defense counsel who receive or review the Sensitive Discovery Material are prohibited from

further disclosing or disseminating the Sensitive Discovery Material, and shall be informed of and bound by the entirety of this Order;

3. The defendant JOSEPH MINER is prohibited from keeping or possessing a copy of any Sensitive Discovery Material except when reviewing the Sensitive Discovery Material in the presence of counsel or staff assisting defense counsel; and

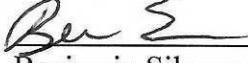
3. All Sensitive Discovery Material shall be returned to the government within ten days of the defendant's sentencing before this Court.

IT IS SO ORDERED.

Dated: Brooklyn, New York
May 18, 2021

MARK J. LESKO
Acting United States Attorney
Eastern District of New York

By: /s/ Josh Hafetz 
Josh Hafetz
Artie McConnell
Assistant United States Attorneys



Benjamin Silverman, Esq.
Counsel for Joseph Miner

SO ORDERED.

THE HONORABLE WILLIAM F. KUNTZ, III
UNITED STATES DISTRICT JUDGE
EASTERN DISTRICT OF NEW YORK